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February 28, 2025

Via ECF

Hon. Marcia M. Henry
United States Magistrate Judge
United States District Court
Eastern District of New York

Re: *Allstate Ins. Co., et al. v. Accelerated Surg. Ctr. of N. Jersey, LLC, et al.*,
Index No. 23-CV-6194 (EK) (MMH)
Plaintiffs' Status Report on Defendant's Bankruptcy Proceedings

Dear Judge Henry:

We represent the Plaintiffs Allstate Insurance Company, Allstate Indemnity Company, Allstate Property & Casualty Insurance Company, and Allstate Fire & Casualty Insurance Company ("Plaintiffs") in this action, and we write to respectfully submit this Status Report in accordance with the Court's Order of January 21, 2025.

As directed by the Order, we write to update the Court regarding the chapter 13 case of Defendant Kristappa Sangavaram, M.D. ("Dr. Sangavaram"). As noted in our previous status report on January 17, 2025 (ECF No. 49), it continues to be Plaintiffs' understanding that the automatic stay remains in effect as to Dr. Sangavaram. See 11 U.S.C. § 362; In re Sangavaram, No. 23-16199 (JKS), ECF No. 18 (Bankr. D.N.J. Aug. 10, 2023) (Order extending automatic stay upon motion pursuant to Bankruptcy Code Section 362(c)(3)(b)).

Since the January status report, Plaintiffs have continued to seek to reach a mutually agreeable resolution with Dr. Sangavaram that could resolve all claims herein against him and the remaining entity Defendants Bedford Medical Services P.C., Elmwood Park Medical Group P.C., Molnar Medical Services P.C., Riverside Medical Services P.C., Tremont Medical Services, P.C., and Tristate Multispecialty Medical Services PC (the "PC Defendants") of which Dr. Sangavaram

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is the record owner. To Plaintiffs' knowledge, the PC Defendants are not themselves debtors in any bankruptcy proceedings.

Plaintiffs will continue to update the Court on the status of the bankruptcy proceedings and their discussions with counsel for Dr. Sangavaram.

Respectfully submitted,

SHORT & BILLY, P.C.

A handwritten signature in black ink, appearing to read "Andrew S. Midgett", is written over a horizontal line.

By: Andrew S. Midgett, Esq.

Attorneys for Plaintiffs